

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH DAKOTA

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Case No. 13-10118  
(Chapter 11)

In re: :

NORTHERN BEEF PACKERS :

LIMITED PARTNERSHIP, :

Tax ID/EIN: 26-2530200, :

Debtor. :

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**MOTION FOR APPROVAL OF  
STIPULATION BETWEEN WHITE OAK GLOBAL ADVISORS, LLC  
AND SCOTT OLSON DIGGING, INC.  
FOR PARTIAL RELEASE OF ESCROW FUNDS**

Comes now White Oak Global Advisors, LLC (“White Oak”), by and through its attorneys of record, Woods, Fuller, Shultz & Smith P.C., and move the Court for approval of the Stipulation Between it and Scott Olson Digging, Inc. (“Scott Olson”) for Partial Release of Escrow Fund entered into between the parties and dated as of November 18, 2014, on the following grounds and for the following reasons:

1. Debtor filed a voluntary Chapter 11 petition in bankruptcy on or about July 19, 2013.
2. White Oak and Scott Olson are creditors and parties in interest in this bankruptcy case.
3. This Court has jurisdiction pursuant to 28 U.S.C. § 157 and 1334 and the Order of General Reference dated July 27, 1984, entered by the United States District Court, District of South Dakota.

4. White Oak and Scott Olson have entered into a Stipulation for Partial Release of Escrow Funds, a copy of which is attached hereto as Exhibit A.

5. It is in the best interests of the estate and parties in interest for the Court to approve the Stipulation.

**WHEREFORE**, White Oak prays that the Court enter an Order approving the Stipulation for Partial Release of Escrow Funds dated as of November 18, 2014.

Dated this 19th day of November, 2014.

**WHITE OAK GLOBAL ADVISORS, LLC**

**WOODS, FULLER, SHULTZ & SMITH P.C.**

By /s/ ROGER W. DAMGAARD

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